



Drohan Lee

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February 7, 2011

U.S Securities and Exchange Commission  
100 F Street N.E  
Washington, D.C. 20549  
Attn: Darren E. Long, Esq.

Re: **In the matter of ThinkStrategy Capital Management, LLC**  
**File No. HO-11277**

Dear Mr. Long:

This letter responds to the subpoena issued to ThinkStrategy Capital Management LLC ("ThinkStrategy") dated December 9, 2010.

Response to Production Request Number 1 and 2:

Enclosed please find discs containing documents on the ThinkStrategy shared server. These discs contain documents relevant to the request for communications to, from and copying ThinkStrategy.

In addition, please note that the documents bates stamped number 4487 to 4496 were received from Folio Administrators.

Response to Production request Number 3 and 4:

Enclosed please find discs containing documents on the ThinkStrategy shared server. These discs contain documents relevant to the request relating to any managed account, advisory account, or pro forma calculation relating to performance of any ThinkStrategy Capital Fund L.P. or ThinkStrategy Capital Fund, Ltd. At this time there are no further documents for production.

Response to Production Request Number 5:

At this time there are no documents relating to any brokerage account held by Karan Kapur in ThinkStrategy's possession.

Response to production Request Number 6:

At this time there are no documents relating to Smart Trader, or other trading software, activity used to calculate or produce any performance returns for any ThinkStrategy fund.

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Please note that I have not bated-stamped the documents produced from the shared server. Many of these documents are likely duplicates of items already provided and we are providing the documents in their native format. In addition, we have redacted all documents falling within attorney/client privilege. I will be providing a privilege log.

Sincerely,

A handwritten signature in black ink, appearing to be 'V. Drohan', written over a horizontal line.

Drohan Lee LLP  
By Vivian R. Drohan

cc: Chetan Kapur



From: Mossfon Trust Corporation  
Sent: Lunes, 17 de Mayo de 2010 02:43 p.m.  
To: 'ckapur3@gmail.com'  
Cc: Edison Teano - Mossfon Trust; Alexandra Kourany - Lawyers  
Subject: Fully Managed Company/Foundation -- (1762329/ET/dl)

Dear Mr. Kapur,

First of all, we would like to introduce MOSSFON TRUST CORPORATION, which is the Fiduciary arm of the Mossfon Group. We have been requested by our Lawyer Alexandra Kourany in order to communicate with you concerning the acquisition of a Fully Managed Company and Foundation, and open a bank account with Bank Vontobel at Zurich.

Acquisition of a Fully Managed Company and Foundation:

Would you be so kind as to confirm if you would like to incorporate your own company/foundation, or would like to acquire one of our readymade companies/Foundation? In case you decide the latest option, we have reserved for you the following Panamanian companies/Foundations until 21st May, 2010, free of charges:

**Shelf Companies:**

**Name**

**Incorporation's date**

**UNIQUE MARKETING S.A.**

**10th February 2010**

**TAYBERRY PROMOTION CORP.**

**10th February 2010**

**QUADRILL MANAGEMENT S.A.**

**9th February 2010**

**Shelf Foundations**

**Name**

**Incorporation's date**

**TALIC UNIVERSAL FOUNDATION**

**23rd January 2010**

**PHARELL FOUNDATION**

**4th January 2010**

The Company and the Foundation will have our full nominee services, unless you instruct otherwise, to wit:

- Provision of our Directors/Officers of the company
- Provision of our Foundation Council
- Provision of authorized signatories for the bank account

**Structure:**

Just for your information this is the structure that we plan to build for you in order you may have a better

overview of it:

cid:image001.png@01CAF5A9.2C14A8B0

As you will notice from the above chart, you will have a Panamanian corporation, which will have a bank account. The Panamanian Foundation will be owner of the company (shares of the Panamanian company will be issued in the name of the Foundation). Inside the Panama Foundation we will prepare for you the Regulations with the information about the beneficiaries.

Opening of a Bank account with Bank Vontobel:

Once we have formed your structure (including the preparation Foundation's Regulation outlining the Assets and Beneficiaries), we may fill out all the bank forms to open the Company's account with the Bank Vontobel, with the provision of our authorized signatories. We already have the bank forms and requirements previously provided by you. However, we will appreciate if you can provide us the following information:

7. Initial deposit amount and how that initial amount is going to be transferred. International transfer, check?
8. How many bank transfer for year, amounts and origins
9. Destiny of the funds and origin of the funds (Source of Funds).
10. Name of the principal clients and providers
11. Purpose of the bank account and the companies activities.
12. The use you will give to the company and the Foundation.

#### Due Diligence requirements

Our Alexandra Kourany will still be in communication with you in order to complete the DD documents for our Compliance Dept. However, in addition to the DD documents, we would appreciate if you can complete, sign and send to us the attached Master Fiduciary Services Agreement. Thank you for completing the provision of the due diligence documents to us as they are necessary to be completed before we provide you the above structure.

We trust you will find this information helpful, and look forward to receiving your comments.

Kind regards,

Daniel LeÃ³n

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Panama, Republic of Panama

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7 + 507 263-8972

\* HYPERLINK "mailto:%20Arauz@mossfon.com"Dleon@mossfon.com

<http://www.mossfontrust.com>

MESSAGEID : 5162d69e1c852145bbfd2e8edbb249f7010393e1@dlknysbs.dlkny.local  
MESSAGEINDEX : 677  
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SOURCE : ThinkStrategy Capital Management, LLC  
PROD\_DATE = 02/07/2011  
REQUESTID = 37532  
LOADID = 35901  
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